

EXHIBIT 32

MATTHEW PLOSZAJ
6/10/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
Plaintiffs,)	
vs.)	No. 20-cv-00983-TSZ
CITY OF SEATTLE,)	
Defendant.)	

ZOOM VIDEO DEPOSITION UPON ORAL EXAMINATION
OF
MATTHEW PLOSZAJ

10:30 a.m.
June 10, 2021

*** This transcript is marked confidential. ***

REPORTED BY: Pat Lessard, CCR #2104

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1 A. Have I sat insurance approval?

2 Q. Sought insurance approval.

3 A. Sought. I have not sought insurance
4 approval. What is insurance approval?

5 Q. You don't know what insurance approval is?

6 A. I don't.

7 MR. REILLY-BATES: Counsel, that's
8 unnecessary.

9 MS. PRATT: We can take a break now.

10 THE VIDEOGRAPHER: The time is 4:04 p.m.
11 We're off the record.

12 (Recess.)

13 THE VIDEOGRAPHER: The time is 4:12 p.m.
14 We're back on the record.

15 Q. (By Ms. Pratt) Mr. Ploszaj, what efforts
16 have you made to search for and collect records
17 related to your claims in this case?

18 A. I have gathered -- you said record -- to
19 search for records to support my claims in this case?

20 Q. I did not say to support your claims.

21 A. Okay.

22 Q. I said what effort have you made to search
23 for and collect records related to your claims in this
24 matter.

25 A. My records being?

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1 Q. Any documents, photos, video, text messages,
2 electronic communication or physical communication.

3 A. Sure. I've made, I would say, significant
4 efforts. I've gathered, I've dumped my whole phone
5 onto a drive, including my messages, photos, videos
6 around CHOP.

7 I've gathered emails, letters,
8 correspondence and submitted those as well.

9 Q. What do you mean you dumped your whole phone
10 onto a drive?

11 A. I can't recall the specifics but I used some
12 sort of software to download the contents of my phone
13 and extract text messages from it to send somewhere, I
14 don't know where. And --

15 Q. Do you have all of your messages?

16 A. As far as I'm aware.

17 Q. What type of phone do you have?

18 A. Oh, I believe it's an iPhone 11.

19 Q. Is that the same phone you had when you
20 dumped your phone onto a drive?

21 A. Yes.

22 Q. What phone did you have before your
23 iPhone 11?

24 A. I'm a little embarrassed to say, like an
25 iPhone 5. iPhone 5.

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1 A. Say it again.

2 Q. You said you looked through Google Mail
3 during a certain time period. Did you use --

4 A. Right.

5 Q. -- Search?

6 A. That's possible. I can't remember the
7 specifics. It's also possible I just looked through
8 the mail at that point in time, a set point in time.
9 I think that sounds more like it, but I can't recall
10 specifically.

11 Q. Why didn't you provide any of your job
12 applications?

13 A. You know, I didn't say anything about CHOP
14 in my job applications.

15 Q. Is that the reason why you didn't provide
16 them?

17 A. I suppose it's a lack of a reason to provide
18 them, maybe, might be a better answer.

19 Q. Did you delete any text messages?

20 A. No.

21 Q. Do you remember exchanging messages with a
22 friend who had told you you could delete messages?

23 A. I don't recall anything like that.

24 Q. Your testimony now is that you don't delete
25 any text messages?

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1 MR. REILLY-BATES: Objection; asked and
2 answered.

3 Q. (By Ms. Pratt) Go ahead.

4 A. I can't recall deleting anything other than
5 a suspicious looking message from, for example, http:
6 forward slash XYZ59.com saying "Click on this for some
7 prize."

8 I think those might be the only things I
9 would have deleted. And even then, I don't -- I
10 couldn't tell you how to delete a text message.

11 Q. Did you delete any other documents, meaning
12 emails or any other electronic type of record or any,
13 you know, get rid of any physical record related to
14 your claims in this case?

15 A. No.

16 Q. I just dropped an exhibit that was
17 previously marked as Exhibit 8.

18 (Referred Deposition Exhibit No. 8.)

19 Q. (By Ms. Pratt) Please let me know when you
20 see that.

21 A. I see it.

22 Q. Please open it.

23 A. Okay. Okay, it's open.

24 Q. If you would go to page twelve you'll see
25 your name on the bottom half of the page.

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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of MATTHEW PLOSZAJ was taken stenographically by me on June 10, 2021, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome.

I further certify that in accordance with CR 30(e) the witness was given the opportunity to examine, read and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand this 15th day of June, 2021.

Pat Lessard
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